

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

A.C., C.P., T.T., T.M., T.B., R.P., and C.W.

Plaintiffs, by and through their next
friends and guardians,

Civil Action No. 21-cv-3466

v.

Magnolia Independent School District,
Defendant.

DECLARATION OF CRYSTAL WAUGH

1. My name is Crystal Waugh. I am the mother of C.W. and his legal guardian along with my husband and C.W.'s father, Ryan Waugh. I am competent to give the testimony contained in this declaration. I have personal knowledge of the facts stated herein, and they are true and correct.

2. C.W. is 12 years old and is in seventh grade at Bear Branch Junior High School.

3. C.W. has worn long hair for almost his entire life. Wearing long hair gives him confidence, makes him feel comfortable, and helps him feel unique.

4. Our family moved to Magnolia, Texas, last year and my son started school in person at Magnolia ISD in January 2021. When C.W. started school this January, his long hair was not an issue. For the entire spring semester, C.W. was allowed to participate fully in his regular classes and attend all school activities at Magnolia ISD while wearing long hair. No teacher or school administrator asked him to cut his hair, nor did he face any disciplinary

consequences or the threat of punishment. Wearing long hair seemingly had no effect on C.W.'s grooming and hygiene, discipline, disruption, safety, or respect for authority.

5. On August 17, 2021, C.W. texted me that some teachers were telling him that he needed to cut his hair. That same day, in C.W.'s science class, the principal and assistant principal visited his class and announced to all of the students that any boys who wore long hair would have to cut it or be sent to ISS. Students in the class immediately looked at C.W. and knew that he was getting in trouble.

6. That same day, I met with Principal Julia Venghaus and Assistant Principal Sheri Cantu and asked them if it was true that C.W. would be sent to ISS simply for wearing long hair. Principal Venghaus told me, "This is our policy—it's my job to enforce it."

7. I then contacted Magnolia ISD's district headquarters, where I spoke with Ben King, the director of secondary student services. He told me that there was nothing that he could do: C.W. would be required to cut his hair or sent to ISS.

8. After school administrators announced that any boy who wears long hair would be punished in school, other students started criticizing C.W. for wearing long hair. One student jeered at him: "You're going to have to get a haircut." And another student said, "if your hair is long, you might as well be a girl." (**Exhibit 59**).

9. Principal Venghaus told us that C.W. had to get his hair cut or he would be sent to ISS on Monday, August 23. My husband and I tried every avenue we could to get the district to reconsider its decision to force C.W. to cut his hair, including by filing a complaint of gender discrimination in accordance with Magnolia ISD's FNG (Local). But the district insisted that C.W. either cut his hair or be sent to ISS.

10. My husband and I spoke with C.W. about this situation. Although he did not want to be forced to cut his hair, he also did not want to be severely punished and removed from his seventh-grade classes. Faced with this dilemma, C.W. made the difficult decision to cut his hair.

11. I took C.W. to get a haircut on Monday, August 23. C.W. was so nervous about the district's hair rule being enforced against him that he wore a collared shirt to the hair salon to make sure that his haircut was in compliance with Magnolia ISD's policy.

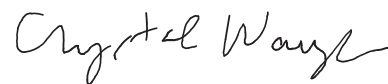
12. The next day, C.W. returned to school and asked his first period teacher whether he was going to punish him by sending him to ISS. C.W. was not sent to ISS because his hair was in compliance, but he felt nervous around school administrators and worried that he would again be ridiculed by other students because of Magnolia ISD's gender-based hair policy.

13. It has now been about two months since C.W. last got a haircut, and his hair is once again very long. I worry that my son could be targeted by Magnolia ISD administrators any day for wearing long hair, since his hair is very long.

14. My son seeks to wear long hair at Magnolia ISD like many other students are already allowed to do. He shouldn't be forced to conform to gender stereotypes and get a haircut or face harsh disciplinary consequences.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in the State of Texas, on 10/20/2021.



Crystal Waugh

EXHIBIT 59

Bear Branch Junior High

Statement Form

Name: _____

Date: 8/19/2021

Grade Level: 7th

I've been called names

I've almost got tripped and some people come behind me and pull my hair
alking out of the gym in 2 periods

People point at me making fun of my hair and personality

They taunt me and make me feel horrible that was by science

They tell me to cut my hair or else I look like a girl and
et bullied for the rest of my life

I get judged and excluded from groups and things like that

They say "If your hairs long might as well be a girl"

They are telling me to change genders

Everyday people walk up to me and say "dress code"

People pull on my backpack

try to steal my stuff

trys to cut my hair and tell me to because there saying I look

like a girl
They make me feel depressed and I don't want to go to
hool because of this

When we were talking about dress code in class and she said can't be over your
herbone everyone looked and pointed at me

They are saying that I should just let them cut my hair because it
looks so bad which almost made me cry.

And today ~~someone~~ ~~came~~ ~~to~~ ~~me~~ ~~that~~ ~~I~~ ~~would~~ ~~ever~~ ~~get~~ ~~friends~~ ~~because~~ ~~of~~ ~~my~~ ~~hair~~
Someone said to me that I would

Signature: _____